

Communications
Workers of America
AFL-CIO, CLC

501 Third Street, N.W.
Washington, D.C. 20001-2797
202/434-1100



October 9, 2015

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

RE: Ex Parte Notice. Technology Transitions, GN Docket No. 13-5; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local exchange Carriers, RM-11358

In response to the extensive evidence that the Communications Workers of America (CWA) has provided to the Commission regarding Verizon's *de facto* retirement/discontinuance of its traditional landline network, Verizon filed a July 15 letter stating that since 2008 Verizon has spent "more than \$200 million on its copper network." In a September 23 letter, Verizon attempted to clarify that statement, noting that "more than \$200 million" referred only to capital investments spent on proactive rehabilitation of copper facilities and related support elements.

Verizon's attempt at clarification remains vague, inconsistent, and inadequate. Even taking Verizon's statement at face value, \$200 million is a paltry amount to spend on proactive rehabilitation of copper facilities over a seven-year period on a network that covers the vast majority of the population in eight states -- New York, Massachusetts, Rhode Island, New Jersey, Delaware, Pennsylvania, Maryland, Virginia, plus Washington, D.C., and parts of California, Texas, and Florida. (Prior to 2010, the Verizon footprint included an additional 4.8 million lines in 14 additional states.)

Recently, twelve mayors in cities across Verizon's core footprint wrote Verizon Chairman and Chief Executive Officer Lowell McAdam with concerns that "Verizon is abandoning the copper network and traditional landline customers are experiencing frequent service outages, delays in repairs and installations, and forced migration to the inferior Voicelink product." The mayors also noted that Verizon has either failed to meet its FiOS deployment deadlines or refused altogether to build FiOS in their cities. (The letter is attached.)

Sincerely,

A handwritten signature in cursive script, reading "Debbie Goldman".

Debbie Goldman
Telecommunications Policy Director
Communications Workers of America

Attachment

October 1, 2015

Mr. Lowell McAdam
Chairman and Chief Executive Officer
Verizon Communications
One Verizon Way
Basking Ridge, NJ 07920

Dear Mr. McAdam:

As the Mayors of 14 major cities along the East Coast, representing over 12 million residents, we are writing to voice our concern at your company's failure to meet the needs of our constituents for access to state-of-the-art fiber optic cable service.

Our cities lie within the core footprint of Verizon Communications and have long valued the quality jobs and fiber upgrades that Verizon promised to bring to our communities. As Mayors, we understand firsthand how vital Broadband is to the growth of our local economies and to nurturing a healthy, competitive marketplace in our state. Our residents use the Internet to search for jobs, build home-based businesses, educate their children and engage in the civic life of our cities.

But consistently and increasingly, our consumers have complained that FiOS service is not available to them. These are not isolated complaints – there are millions of residents in communities throughout the Northeast who have been left without service, and with no plan or promise for future resolution.

In some cases, such as New York City, Pittsburgh, Jersey City and Newark, Verizon has failed to meet contractual or legislative deadlines to make fiber optic cable service available to many of our residents. In New York City, as elsewhere in the Northeast, the FiOS build-out has clear franchise deadlines and availability requirements for residents who would like to purchase FiOS. As New York City thoroughly documented in its recent audit, Verizon has failed to meet its contractual deadlines for rollout and service installation. In other cases, such as Syracuse, Worcester, Lowell, and Albany, Verizon has simply refused to build FiOS at all.

Based on irrefutable evidence of your company's poor service record, lack of transparency and accountability, or demands for exclusive agreements with landlords throughout the region, we are deeply concerned that you have not acted like a good corporate citizen and that an incomplete FiOS rollout will result in decreased competition and the reduction of benefits to consumers throughout the Verizon footprint. As elected officials, it is our obligation and our responsibility to bring these complaints to your attention.

At the same time, we are hearing concerns that both in cities covered by a FiOS franchise or in which FiOS is still completely unavailable, Verizon has been abandoning the copper network and traditional landline customers are experiencing frequent service outages, delays in repairs and installations, and forced migration to the inferior VoiceLink product. As you know, the New York Public Service Commission stated in its recent Staff Assessment of Telecommunications in NY: "In many areas of New York City, the legacy copper infrastructure is in such poor condition that copper failures due to weather conditions can cause long delays for service restoration and Commission service quality standards are missed."

Finally, we have watched closely the contract negotiations with the CWA and IBEW. Some of the issues in the labor negotiations are directly related to the issues we raise above. For example, after a decade in which the workforce has been reduced by a third, we have serious reason to be concerned that Verizon is not committed to job security. As Mayors who understand the importance of job growth in our communities, we are committed to ensuring the expansion – not the reduction – of opportunity in our cities. The Verizon workforce provides economic ballast in many of our cities. But the company must sustain a workforce adequate to build and maintain FiOS in all of our communities, and to ensure that during the transition from copper to FiOS, service quality is maintained on the traditional network.

Vigorous competition to provide the most advanced services at the lowest prices is a goal our cities share. We also believe deeply in closing the digital divide and ensuring that our city residents have the same choices of providers as the affluent suburbs. In a time of growing concern about income inequality, we are taking steps to preserve and grow good jobs. A good contract for technicians or retail workers at Verizon Wireless, where Verizon is seeing profitability, provides a meaningful opportunity for reducing income inequality.

We want to partner with Verizon in the future so that all of our cities can thrive and grow in the digital economy of the 21st century. This includes clear steps to better serving consumers and resolving disputes with your workforce. We look forward to hearing from you at your earliest convenience.

Sincerely,



Bill de Blasio
Mayor
New York City



James Kenney
Democratic Candidate for Mayor
Philadelphia



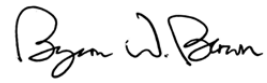
William Peduto
Mayor
Pittsburgh



Ras Baraka
Mayor
Newark



Steven M. Fulop
Mayor
Jersey City



Byron Brown
Mayor
Buffalo



Joseph M. Petty
Mayor
Worcester



Jose Torres
Mayor
Paterson



Stephanie Miner
Mayor
Syracuse



Rodney M. Elliot
Mayor
Lowell



Kathy Sheehan
Mayor
Albany



Bill Carpenter
Mayor
Brockton



Eric E. Jackson
Mayor
Trenton



Daniel Rizzo
Mayor
Revere